

# DICKSTEINSHAPIRO<sub>LLP</sub>

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March 3, 2008

## By Electronic Filing

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-A325  
Washington, DC 20554

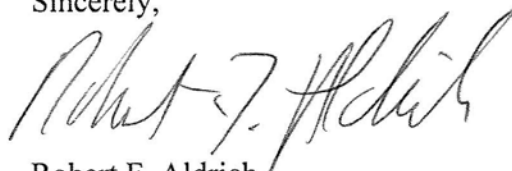
**Re: EB Docket No. 06-36**

Dear Ms. Dortch:

Please find enclosed a copy of the 2008 CPNI compliance certification of Network PTS, Inc.

Please contact the undersigned if you have any questions about this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Aldrich", written in a cursive style.

Robert F. Aldrich

Enclosure

cc: Enforcement Bureau, Telecommunications Consumers Division (2)  
Best Copy and Printing, Inc.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification****EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2008

Name of company covered by this certification: Network PTS, Inc.

Form 499 Filer ID: 826657

Name of signatory: Thomas Keane

Title of signatory: CEO

I, Thomas Keane, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that in my opinion are adequate to ensure compliance with the Commission's customer proprietary network information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company [REDACTED] taken any actions against data brokers in the past year.

The company [REDACTED] received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Thomas R Keane

**NETWORK PTS, INC.**  
**STATEMENT OF CPNI PROCEDURES**

1. Network PTS uses, discloses, or permits access to customer proprietary network information ("CPNI") pursuant to confidentiality agreements for the purposes of providing and billing for communications-related services. Network PTS may also use, disclose, or permit access to CPNI to protect Network PTS's rights or property, to protect against fraudulent, abusive, or unlawful use of communications-related services, and to respond to compulsory legal process.

2. Network PTS does not sell or rent CPNI to other entities. Network PTS does not make CPNI available to its sales personnel and does not use, disclose, or permit access to CPNI for marketing purposes.

3. CPNI maintained by Network PTS is secured in password-protected data files. Access to CPNI data files is permitted only to authorized Network PTS personnel. Any unauthorized use, sale, or disclosure of CPNI by any employee of Network PTS would subject the employee to disciplinary action, up to and including immediate dismissal.4. Network PTS does not disclose CPNI in response to customer-initiated telephone contact or online access, other than by calling the customer at the customer's telephone number of record or sending the information to the customer's address of record.